



DATE: November 10, 1983

TO: Division File

FROM: Perry C. Mann *PCM*

SUBJECT: LPC 11902002 - Madison County - East Alton/Olin
ILD006271696 - Subpart F Inspection dated September 19, 1983

EPA Region 5 Records Ctr.



382853

An inspection to determine compliance with the Subpart F: Ground Water Monitoring Requirements was conducted on September 19, 1983. Mr. Mike Redington and Mr. Wayne Galler, representing Olin Corporation, were contacted.

It was determined that no ground water monitoring program has been developed for the surface impoundment, which has a one million gallon capacity. The subject impoundment is utilized as an emergency storage area for corrosive liquids (D002), which upon such emergencies, are bypassed from the neutralization facility into the subject impoundment. Because of the circumstances surrounding the use of this impoundment, Olin has petitioned the USEPA for the delisting of the wastewater this impoundment receives. Attached is a letter from Olin, dated November 4, 1983, in response to inquires regarding the status of their petition. In the letter, Olin indicates that the review of their petition had been completed and "written up for approval", however, because of some contemporary pending legislation, the USEPA had indicated that "no new petitions are being approved". Verification of this has been unobtainable despite numerous unsuccessful attempts to contact a William Sproat, USEPA, who is responsible for petition review.

Nevertheless, the requirements under 725.190-194 Subtitle G: Waste Disposal Regulations are in fact applicable to the subject surface impoundment. As stated previously, no program has been developed as of the inspection date. A ground water monitoring program, developed in compliance with 725.190-194 and the established guidelines as described in Ground Water Monitoring Guidance of Owners and Operators of Interim Status Facilities, USEPA; SW-963: Revised March 1983, is necessary for immediate development and implementation.

PCM:jlr

cc: Southern Region ✓
Olin Corporation
Mark Haney
Monte Nienkerk
Phil Van Ness